UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August 16, 2010

Mr. Patrick Solomon
Campus Development EIS
c/o HDR/e^{2}M, Suite 100
2600 Park Tower Drive
Vienna, VA 22180

Re: Draft Environmental Impact Statement Addressing Campus Development at Fort George G. Meade, Maryland (CEQ 20100242)

Dear Mr. Solomon:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Fort George G. Meade Campus Development in Maryland.

The National Security Agency/Central Security Service (NSA/CSS) is a cryptologic intelligence agency administered as part of the Department of Defense (DOD). This agency is responsible for the collection and analysis of foreign communications and foreign signals intelligence. For NSA/CSS to continue to lead the Intelligence Community into the next 50 years with state-of-the-art technologies and productivity, its mission elements will require new facilities and infrastructure.

The purpose of the Proposed Action is to provide facilities that fully support the Intelligence Community's mission. The need for the Proposed Action is to consolidate multiple agencies' efforts to ensure capabilities for current and future mission requirements as directed by Congress and the President.

To meet the NSA's continually evolving requirements, the DOD proposes to develop a portion of Fort Meade (referred to as "Site M" which consists of approximately 227 acres) as an operational complex and to construct and operate consolidated facilities for Intelligence Community use. DOD has considered development of Site M under three discrete phases identified for implementation over a horizon of approximately 20 years. Implementation of Phase I is the Proposed Action. Phases II and III are being analyzed as alternative development options.

The Proposed Action (Phase I) would occur in the near term (approximately 2012 to 2014) on the eastern half of Site M-1, supporting 1.8 million square feet of facilities for a data center and associated administrative space and provide administrative functions for up to 6,500 personnel.

Alternative 1 (Phases I and II) would include implementation of the Proposed Action (Phase I) along with Phase II. Development would occur in the mid-term (2020) on the eastern half of Site M-1, supporting the construction of an additional 1.2 million square feet of administrative facilities including demolition. Phases I and II combined would have a total built space of 3.0 million square feet for 8,000 personnel.

Alternative 2 (Phases I, II, and III) would include the implementation of the Proposed Action (Phase I) along with Phases II and III. This alternative would include the demolition of the golf clubhouse buildings. Under Phase III, development would occur on Site M-2 in the long term (2029) supporting the construction of an additional 2.8 million square feet of operational administrative facilities, for a total built space to 5.8 million square feet for 11,000 personnel under all three phases.

EPA understands the purpose and need for the action proposed for NSA. However, as a result of our review of the DEIS, EPA developed comments and questions (presented in the attached Technical Comments). The three Phases of development appear to be a tiered approach to full build-out as opposed to a comparison of alternatives. Of particular concern is the "Alternatives/Need" for the NSA to fulfill its mission requirements. As presented in the DEIS, the phases of development and/or alternatives stretches over an expanse of land so it is not clear if the Proposed Action meets the mission requirements of NSA and whether the additional phases presented are necessary for meeting the mission requirements. Comments specific to this concern and others pertain to biological resources, vegetation, wetlands and cumulative effects are discussed in the attachment. EPA rated the DEIS an EC-2 (Environmental Concerns/ Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of the EPA's rating system is enclosed for your information.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosures (4)

Technical Comments

Alternatives/Need Analysis

As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR 1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate inter-agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis.

As outlined in Section 2.2.2 Development Alternatives Eliminated from Further Detailed Analysis, EPA appreciates and understands NSA's selection of Site M for campus redevelopment and the limitations associated with redeveloping the existing campus on Fort Meade as well as the desire to remain on Fort Meade as opposed to moving to a new location. However, as presented in the DEIS, the three Phases of development appear to be a tiered approach to full build-out as opposed to a comparison of alternatives. Each of the phases of development (Phase I, II, and III) and alternatives (Proposed Action, Alternative I, and Alternative II) consists of an increase in building footprint, personnel, cost, etc. rather than a comparison of similar alternatives. As a result, the purpose of the DEIS seems to be used to decide on a phased approach to the project as opposed to a presentation of alternatives (e.g., locations) and a complete analysis of the impact of the project.

In addition, as the document reads the "Need" for the action is not clear. What is NSA's "need" then, the Proposed Action (1.8 million square feet and 6,500 personnel), Alternative I (3.0 million square feet and 8,000 personnel) or Alternative II (5.8 million square feet with the addition of 11,000 personnel)? If the goal is to ultimately build for 5.8 million square feet with an increase in employee personnel of 11,000 then the Alternatives Analysis is inadequate as the three alternatives cannot be compared with each other. An Alternatives Analysis is typically a comparison between designs to meet a stated need. The design (for instance) can vary location, approach (e.g. consolidation vs. dispersing) or footprint. The FEIS should succinctly discuss how the Proposed Action meets the need for the NSA as well as provide a clear basis for choice among options. In addition, if the need is to pursue additional expansion (beyond the Proposed Action) in the future, then this should be explicitly stated in the FEIS with expectation that Phases II and III may need to be evaluated in a separate NEPA evaluation.

Energy Efficiency/Alternative Energy

Section 2.1.2 Operational Complex – Principal Facilities (page 2-3) states, "The facilities would be energy-efficient and use "green" technology, including photovoltaic panels, solar collectors, heat recovery systems, wind turbines, green roofs, and habitat-oriented storm water management, where feasible." EPA commends the Department of Defense (DOD) and NSA for its intent to incorporate sustainability features into the operational complex; however, the specified energy-efficient technologies would require additional environmental analysis to determine potential impacts, especially with regards to wind turbines. Size, number, location of

wind turbines and potential environmental impacts would need to be addressed. Thus, the FEIS should state DOD/NSA's intent to prepare a separate environmental evaluation for proposed energy-efficient technologies, such as wind turbines, etc. as the current documentation does not suffice to describe or analyze the impacts associated with these energy alternatives.

This project does present an excellent opportunity to implement the President's Executive Order 13423, Strengthening Federal Environmental Energy and Transportation Management by incorporating energy efficiency into the planning efforts. Enclosed with this letter is information that we recommend the DOD/NSA consider when planning the Proposed Action.

Biological Resources/Vegetation

As noted on page 4-74, the Proposed Action would impact forested areas on the western portion of Site M-1. Site M-1 includes approximately 137 acres of open and wooded land uses. Forest lands located within the entire Site M project area total approximately 104 acres. At this point in the planning process, the actual total acreage of forested lands and vegetation disturbed would depend on the design and layout of the different structures or facilities, the number of buildings required, the size and layout of parking facilities, and the constraints of each of the proposed sites. Because the Campus Development is conceptual and the design plan has not been defined, it is suggested that conservation of the forested area (as feasible) be a factor in the planning/design phase of development. In addition, the FEIS should provide an analysis of forest fragmentation associated with each alternative. The analysis should include potential impacts on species with wide home ranges.

Page 4-75 states, "Large or historic trees (those that are preferred determinant natives, such as oaks and American beech) would be preserved to the greatest extent possible and additional trees planted around them." EPA appreciates the intent to protect large and/or historic trees; however, the FEIS should indicate the size, kind and number of large and/or historic trees to understand the impact and to assess proper mitigation.

Since the Proposed Action would result in a substantial increase in impervious surfaces, as the existing condition of Site M is a golf course with permeable vegetated surfaces throughout with patches of tree cover, it is expected that the kind and quantity of vegetation/trees that will be lost is described in the FEIS. Any effort to add vegetation should be discussed; native species is always recommended.

Wetlands

Page 4-75 states, "Long-term, direct and indirect, adverse impacts are expected as the result of the Proposed Action on the wetland on the eastern portion of Site M-1." The wetland impact should be specified and identified with those already referenced (i.e. Wetland-1, Wetland-2, Wetland-3, Midway Branch) as well as quantified and described. The FEIS should also provide the functional values of all impacted wetlands and develop a mitigation plan for their replacement. It is assumed that only one wetland is impacted by the Proposed Action which should be clearly stated and identified in the FEIS.

It is noted on page 3-42 that Wetland-2 is a 0.39-acre Palustrine forested habitat. It is important to note that forested wetland systems act as natural filters and sediment traps and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant values and functions. Alternatives are available that must be explored as part of the process to avoid these functioning systems.

In addition to the maps (Figure 2.6-1 and Figure 3.7-1) which depict wetlands on Fort Meade, it would be helpful to have depicted on these maps the wetlands identified on page 3-42; specifically, Wetland-1 (a 0.06-acre Palustrine emergent herbaceous habitat), Wetland-2 (a 0.39-acare Palustrine forested habitat), Wetland-3 (a 0.02-acre Palustrine emergent and open water habitat). Also, it would be helpful to indicate on the map the wetland(s) impacted by the Proposed Action as well as other phases.

Soil/Groundwater

As stated on page 3-70, "Soil sampling investigations were conducted as part of a 2004 Environmental Baseline Survey (EBS) of Site M to determine if environmental contamination from pesticide use at the golf courses was present. Sampling results determined that pesticides, including heptachlor epoxide, alpha chlordane, gamma chlordane, and dieldrin, were in excess of MDE soil cleanup standards at several sampling locations with Site M." In addition, the DEIS states, "The sampling investigation did not test for arsenic and lead, which were commonly used as pesticides in the past, and it did not include groundwater sampling." However, the discussion within the Environmental Consequences section, Page 4-94 states that "Minor pesticide contamination was noted within the area of the Proposed Action; however, the level of contamination was reported as not significant enough to impact the future use of Site M and would not require remedial action." It is not clear why the DEIS states that remedial action is not required when it is stated that pesticides were in excess of MDE soil cleanup standards at several sampling locations. Also, it is not understood as to why the sampling investigation did not test for arsenic and lead knowing that they were commonly used as pesticides in the past. The FEIS should also explain why there was no groundwater sampling considering the type of contaminants discussed.

An active IRP Site FGGM 95 is a compilation of 23 nearby landfills. Of the 23 landfills, 8 are within Site M. A number of these sites will require future soil and groundwater monitoring to determine appropriate remedial actions. The DEIS states that prior to the start of construction activities for the Proposed Action, all appropriate remediation measures would be completed at IRP Site FGGM 95. EPA commends DOD/NSA for its intent to cleanup prior to construction of the Proposed Action; however, there is no commitment for cleanup of Phases II and III which would be a vital action for reuse. Without this commitment it seems premature to plan for the proposed site prior to remediation. When design of remedial action is determined, it should be seen if any development plan is consistent with the action.

Transportation

As noted on page 4-40, the funding details are not finalized yet for the road improvements. With a minimum increase of 6,500 employees that would be traveling to and from Fort Meade which would result from the Proposed Action not including the increases of people into the area from other cumulative actions, it would seem necessary to have funding confirmation to ensure the influx of people can be properly managed prior to initiating the Proposed Action.

As noted on page 4-35 under Recommendations, "The results of the study indicate that the influx of new traffic would significantly affect the existing roadway capacity in the vicinity of Fort Meade." This would be a result of the Proposed Action and other projects proposed for the area. Thus, it is recommended that "A region-wide traffic study is suggested to analyze the impacts of future growth in and around Fort Meade and on the regional roadways network in Howard County and Anne Arundel County." EPA defers evaluation of the transportation/traffic impact to the appropriate transportation regulatory agencies; however, it would seem prudent to conduct a region-wide traffic study prior to approval of the Proposed Action to ensure appropriate measures could be implemented to handle the large number of people/vehicles brought into the area as a result of the many actions imposed on the area. In addition, impacts of any transportation improvements should be considered cumulatively with the Fort Meade development.

Environmental Justice

The discussion of Environmental Justice (EJ) does not speak of the impact to minority and low income populations in the area of Fort Meade. Are there classified populations in the immediate vicinity of Fort Meade? If so, describe which communities were identified as EJ concern and how these populations are being involved through outreach in the decision making process. The EJ assessment should assure the protection and appropriate level of consideration for the potential adverse impacts that may have an effect on minority and low income populations living in the area near the site. The FEIS should provide a clear and accurate assessment documenting the identification of areas of potential EJ concern and the potential impacts that may result from the Proposed Action.

Low Impact Development

A Presidential Memorandum (dated April 26, 1994) and Guidance (dated August 10, 1995) applicable to Federal facilities and federally funded projects pertinent to environmentally and economically beneficial landscape practices is to be incorporated into all NEPA-related documents. As outlined in Executive Order 13148 dated April 26, 2000 (Federal Register Vol. 65, No. 81) on Greening the Government, it has been directed that all agencies incorporate the above Guidance into landscape programs, policies and practices. The Guidance calls for agencies that fund and landscape to provide recipients with information of beneficial landscaping as well as to work to support and encourage application of the principles. The EPA, GSA and USDA are tasked with providing technical information on beneficial landscaping to other federal agencies and their facilities. The effort, also recognized as low impact development (LID), has

the potential to reduce impacts on watershed hydrology and aquatic resources. This is described is the enclosure provided.

Cumulative Impacts

The cumulative impacts from the loss of open space and conversion of forested land will be significant. The Proposed Action would result in the loss of 82 acres of open space, the utilities upgrades would result in the loss of 6 acres of open space, the BGE Substation could result in the loss of as much as 83 acres, the BRAC actions would result in the loss of 175 acres of open space, the EUL action would result in the loss of 540 acres. Cumulatively, the loss of open space could be as much as 886 acres or 32 percent of open space on Fort Meade. (This does not include Phase II and Phase III.)

In addition, the cumulative impact from the addition of people into the area is extensive. The Proposed Action would add 6,500 employees to the area. BRAC actions would add 5,700 people to Fort Meade. The EUL project will result in the addition of 10,000 people.

As a result of the loss of open space and forested areas, the large number of people that would be coming into the area and the impact on the road systems, the combined cumulative impacts is adverse.

Although the DEIS does a good job in identifying the resource-specific cumulative impacts, it seems as if multiple resources will be impacted from multiple projects. Since the projects identified are not yet complete, there is a concern that approval and implementation of these projects could result in significant impacts. It would seem prudent to evaluate the environmental impacts that would result from each project and reevaluate the options upon completion. Thus, it does not seem feasible to use the existing environmental evaluation to suffice for Phase II and Phase III. As projects are complete, more accurate data assessment would lend itself to the feasibility of pursuing future projects.